



*The Nation's Voice for People with Hearing Loss*

November 14, 2017

*Via electronic filing*

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Rm TW-A325  
Washington, D.C. 20554

Re: Notice of *Ex Parte*: Misuse of Internet Protocol Captioned Telephone Service (IP CTS) and Speech-to-Speech for Individuals with Hearing and Speech Disabilities, CG Docket Numbers 13-24, 03-123

Dear Ms. Dortch:

On November 6, 2017 Lise Hamlin, Hearing Loss Association of America (HLAA), Claude Stout, Telecommunications for the Deaf and Hard of Hearing (TDI), Blake Reid, Counsel, Telecommunications for the Deaf and Hard of Hearing (collectively, "Consumer Groups") and Linda Kozma-Spytek of the Deaf and Hard of Hearing Tech RERC at Gallaudet University (Gallaudet RERC) met with Karen Peltz Strauss, CGB, Eliot Greenwald, DRO/CGB and Michael Scott, DRO/CGB. The purpose of the meeting was to discuss Internet Protocol Captioned Telephone Service (IP CTS) from the perspective of consumers who use the service.

Consumer Groups and the Gallaudet RERC emphasized the need to continue to ensure that IP CTS phones and services reach the people who need it. We understand that the upcoming items to be released by the Commission will address the rates that providers of IP CTS are allowed under Commission rules. Consumers groups generally are not in a position to comment on rates set for TRS providers or how to determine these rates. However, we are concerned that rate-setting should take into consideration the need to ensure competition and allow providers to enter and stay in the business of providing IP CTS, which is to say, the rates should not be so low that providers are no longer able to stay in the marketplace. In addition, rate structures should be set in such a way that they ensure that quality services are provided. Consumers must have access to a service that is accurate and reliable. We look forward to the results of work on quality and performance standards the Commission's Disability Advisory Committee and others have embarked on, and hope to see that the Commission takes quality and performance standards into consideration when setting rates, as well as ensuring quality services for the consumer.

Consumer groups and the Gallaudet RERC also understand that eligibility for these services is also an issue that will be addressed by the Commission. We are look forward to seeing eligibility criteria developed in a systematic way that results in a repeatable, objective method to ensure that people who need the service have access to it. Our understanding is that at the moment, each state that has an equipment distribution program develops their own method of establishing

criteria for the distribution of captioned phones. Some methods are repeatable with attention paid to the needs of the consumer. Some are much more subjective and even ad hoc, providing more of a demonstration of products than an assessment of need. We worry that a subjective test may result in the consumer getting a less expensive option rather than the device that best meets the needs of the individual consumer. We urged the Commission staff to ensure that eligibility criteria are data-based, objective and repeatable. In addition, we noted that provisions must be made for states that do not have an equipment distribution program. We also urged caution before turning over the setting of eligibility requirements to state or other entities that have few or inadequate resources, or have little to no experience setting up such criteria or experience in serving consumers with hearing loss who may need captioned phone services.

We also discussed the fact that captioned telephones are now appearing on eBay for sale. While this is clearly an alternate way to acquire a captioned phone, it's unclear to us just how widespread this practice is. Phones sold on eBay necessarily cost more than a free phone that comes directly from a provider. Also, we noted that a phone without a service provider is useless. If service providers are requiring certification before the phones are activated, we question how the service provider allows the user to get access to the service with a used phone.

We also discussed that Automatic Speech Recognition (ASR) technology is on the cusp of being accurate enough to work directly with the voice of the individuals on the call, rather than relying on a caller assistant. We are excited and encouraged to hear that there is progress in the field of ASR. However, we again urged caution: we need assurances that the quality of ASR is good enough to ensure that the consumer who uses these services can rely on it for an accurate and complete and understandable text display of what was said.

We look forward to continued work with the FCC on this issue.

Respectfully submitted,

/s/

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